

**CHRONOLOGY OF ACTIVITIES AND EVENTS
RELEVANT TO THE
FLORIDA PHOSPHATE MINING INITIATIVE
2001 - 2005**

March 8, 2001

Florida Department of Environmental Protection (FDEP) and the U.S. Environmental Protection Agency Region 4 (EPA) met to plan consensus approach to address phosphate mining sites in Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS).

June 18, 2001

EPA and FDEP Bureau of Mine Reclamation (BOMR) reviewed phosphate mining sites listed in CERCLIS to determine on which sites EPA should proceed with assessments.

August 28 and 29, 2001

FDEP, the Florida Phosphate Council, and mining representatives toured phosphate mining areas and discussed CERCLIS sites and how to proceed with site assessment/completion.

January 29, 2002

Deputy Waste Management Division Director briefed by EPA Region 4 staff on phosphate related issues, relevant criteria, potential risk, and scope of proposed project.

February 6, 2002

EPA Region 4 staff conducted follow-up briefing with Deputy Waste Management Division Director. Discussion items were potential criteria for evaluating radiation, including Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) risk range, State standards, and Applicable or Relevant and Appropriate Requirements (ARARs); Naturally Occurring Radioactive Materials (NORM) versus Technically Enhanced Naturally Occurring Radioactive Materials (TENORM); and the approach used by EPA Region 9 in Idaho to address radioactive slag.

February 14, 2002

EPA Region 4 staff held conference call with BOMR to discuss support that EPA Superfund Program may provide in addressing threats at Piney Point and Mulberry and whether to address these sites as part of the Florida Phosphate Mining Initiative. Some industry interest had been expressed in purchasing the mines, but this interest is predicated on no Superfund involvement at these sites.

March 2002

EPA Region 4 staff completed *Draft Florida Phosphate Mining Initiative Briefing Report, USEPA, Region 4, Waste Management Division, South Site Management Branch*. Document provided a review of potential risks from elevated radiation exposures in west-central Florida associated with formerly mined phosphate lands, Federal and State regulations, potential screening and response criteria, and potential issues to be considered in proceeding with Florida Phosphate Mining Initiative.

March 3, 2002

EPA Region 4 Office of Public and Congressional Affairs briefed on proposed strategy to address radiological issues at 21 CERCLIS sites and residential areas overlying formerly mined land.

March 6, 2002

EPA Office of the Inspector General (OIG) “mega-site” kick-off conference call conducted to discuss OIG evaluation’s of EPA’s approach to mega-sites. OIG is primarily reviewing mega-site threshold and financial responsibility. Phosphate mines considered to be a major component of the mega-site inventory.

March 28, 2002

EPA Region 4 staff held conference call with Florida Fish and Wildlife Conservation Commission (FWCC), FDEP and Florida Department of Health (FDOH) to discuss potential public health and environmental issues at Tenoroc Mine Wildlife and Fish Management area and the status of the Tenoroc Mine Draft Expanded Site Inspection Report.

May 22, 2002

Aerial reconnaissance conducted by National Oceanic and Atmospheric Administration (NOAA) helicopter of Florida Phosphate Mining Initiative area and Tenoroc Mine.

May 23, 2002

Data Quality Objective (DQO) meeting held for planning of remedial investigation for Tenoroc Mine. Meeting included EPA, Army Corps of Engineers (ACOE), FDEP and FWCC. Issues also discussed were the communication strategy and the need to meet with the Forestry Commission and Department of Corrections because these agencies provide staff to maintain the wildlife management area.

June 26, 2002

EPA Region 4 staff held a conference call with City of Tampa regarding potential use of excess process water from Piney Point Phosphogypsum Plant. City proposes to have water pumped by a pipeline to Florida Power and Light Company (FPL) holding pond. Water would be treated by reverse osmosis (RO) and used for agricultural purposes in the county. City seeking construction grant funding for pipeline.

September 26, 2002

EPA Region 4 personnel provided Florida Phosphate Mining Initiative status briefing to the Chief, South Site Management Branch, Waste Management Division.

October 31, 2002

EPA staff met with Region 4 Deputy Division Director to discuss potential options for addressing phosphate mining sites, including possible use of Resource Conservation and Recovery Act (RCRA) 7008 authority and need to brief Region 4 Chief of Staff, as well as review approach with Office of Radiation and Indoor Air (ORIA).

November 2002

EPA Region 4 staff completed *Proposed Site Management Strategy, Florida Phosphate Mining Sites, South Site Management Branch, Waste Management Division, USEPA, Region .* Strategy is a tiered approach to assess and respond to low-level radiological risks in developed and non-developed formerly mined phosphate lands in west-central Florida.

November 1, 2002

EPA Region 4 Waste Management Division briefed by Region 4 personnel on status of Florida Phosphate Mining Initiative and plans for Office of Emergency and Remedial Response (OERR) briefing.

November 12, 2002

EPA Region 4 staff brief OERR Director on the nature of phosphate mining, potential issues, and proposed strategy to ensure protection of public health and the environment.

December 1, 2002

EPA Region 4 staff held conference call with EPA ORIA, Radiation and Indoor Environments National Laboratory (RIENL), Las Vegas, Nevada, to discuss EPA remote sensing radiation monitoring capability. Also discussed were the use of aerial platform, followed by scanner van and ground-based measurements to evaluate radiation levels in residential and CERCLIS site areas.

January 16, 2003

EPA Region 4 staff met with FDEP Waste Management and Water Management Division Directors to discuss potential community involvement issues and approaches to community involvement and public relations for radiological assessment of formerly mined phosphate lands.

January 23, 2003

Region 4 staff met with EPA Director of Office of External Affairs to discuss potential community involvement issues and approaches to community involvement and public relations for radiological assessment of formerly mined phosphate lands.

February 12 and 13, 2003

Region 4 staff met with Department of Energy (DOE), National Nuclear Security Administration, and Las Vegas, Nevada, Remote Sensing Lab Contractor, Bechtel Nevada, to

discuss scope of work and technical approaches outlined in January 2003 Statement of Work (SOW) and Interagency Agreement (IAG) DW-96-9459-1301-0 to conduct an aerial radiological survey of formerly mined phosphate land.

February 19 and 20, 2003

EPA Region 4 staff met with community involvement (CI) contractor to develop outline for CI strategy for upcoming aerial radiological survey of formerly mining phosphate land in west-central Florida.

March 3, 2003

Waste Management Division pre-briefing was held for Regional Administrator regarding plans for March 5, 2003, meeting with FDEP to discuss scope of proposed aerial radiological survey of formerly mined phosphate lands in west-central Florida. Regional Administrator concurred with Division meeting with State and seeking concurrence on the Florida Phosphate Mining Initiative.

March 5, 2003

FDEP briefed by EPA Region 4 staff on background and scope of Florida Phosphate Mining Initiative to seek concurrence from State to proceed with implementation. FDEP advised that further study was not warranted and adequate investigation had been conducted by EPA in 1978. EPA agreed to review 1978 study.

April 4, 2003

Region 4 Waste Management Division Director briefed on results of EPA Office of Radiation Programs 1978 *Report of Indoor Radiation Exposure Due to Radium-226 in Florida Phosphate Lands* and the effect this data may have on the Florida Phosphate Mining Initiative.

Summary of Key Points/Decisions prepared from April 4, 2003, Waste Management Division Director briefing.

April 15, 2003

EPA Region 4 staff held a conference call with DOE, Remote Sensing Lab, Bechtel Nevada, to discuss draft April 15, 2003, proposal to conduct aerial radiological survey of formerly mined phosphate lands in west-central Florida.

April 29, 2003

EPA Region 4 staff briefed Regional Environmental Accountability Division legal management on status of Florida Phosphate Mining Initiative.

April 30, 2003

EPA Region 4 staff briefed Waste Management Division Director on technical and financial

proposal by DOE, Remote Sensing Lab, Bechtel Nevada, to conduct aerial radiological survey of formerly mined phosphate land. EPA staff were unable to answer all of the Division Director's questions. It was decided that Bechtel Nevada staff would meet with the Division Director.

May 5, 2003

DOE, Remote Sensing Lab, Bechtel Nevada provided a presentation on proposed radiation survey strategy to Region 4 Waste Management Division Director for Florida Phosphate Mining Initiative. Bechtel Nevada successfully answered numerous questions regarding capability and technical approach.

May 13, 2003

EPA Region 4 staff met with DOE, Bechtel Nevada to discuss revised April 28, 2003, proposal to conduct an aerial radiological survey of the formerly mined phosphate land.

June 2003

EPA Region 4 staff completed *Draft Florida Phosphate Mining Strategy, USEPA, Region 4, Waste Management Division, South Site Management Branch*. Strategy reflects revisions made to November 2002 Strategy based on internal EPA comments, EPA Headquarters comments, and State of Florida comments. Revised draft strategy outlines an approach to assess and address potential risks from elevated levels of radiation associated with formerly mined phosphate lands in west-central Florida. Strategy paper addressed potential ARARs, enforcement considerations, and community involvement considerations.

June 5, 2003

EPA Region 4 staff met with Office of Solid Waste and Emergency Response (OSWER) and ORIA to seek concurrence on proposed strategy for the Florida Phosphate Mining Initiative and approval to begin gamma radiation survey. Concurrence denied at meeting by Center Director and elevated to Director for consideration.

June 25, 2003

EPA Region 4 staff met with FDEP BOMR and FDOH to present scope of potential problem and proposed strategy. State advised it does not have authority to address risks from radiation other than radon gas.

July 1, 2003

EPA Region 4 staff prepared regional "Talking Points" for EPA managers and other project team members to respond to media and other public inquiries regarding EPA's radiological survey of formerly mined phosphate land.

July 2, 2003

Waste Management Division Director advised that he is delaying start of aerial radiological survey pending review of the aerial radiological survey approach by both the EPA Environmental Response Team (ERT) and the former Director of the EPA Radiation Laboratory in Montgomery, Alabama.

July 7, 2003

EPA Region 4 staff made initial contact with EPA ERT to discuss overview of project and scope of support requested by Division Director. EPA Region 4 staff agreed to forward background documents.

July 16, 2003

EPA Region 4 staff initiated a procurement request for the services of former Director of the EPA Radiation Laboratory in Montgomery, Alabama, at the request of the Waste Management Division Director.

July 30, 2003

Region 4 staff met with ERT to discuss his initial ideas regarding the development of a revised strategy for the radiological assessment of the formerly mined phosphate lands.

August 6, 2003

Contract signed by former Director, EPA Radiation Laboratory, to provide consulting services in support of the Florida Phosphate Mining Initiative.

August 8, 2003

Waste Management Division Director decided to release hold on FY03 funds planned for spring-2004 aerial survey.

August 19, 2003

Region 4 staff held teleconference with former Director, EPA Radiation Laboratory and ERT to discuss results of their review of radiological assessment approach for formerly mined phosphate lands in west-central Florida. An agreement was made that it would be helpful to hold a meeting to discuss draft report in detail.

August 22, 2003

Waste Management Division Staff met with ERT and former Director, EPA Radiation Laboratory, to review Draft August 22, 2003, evaluation report of Region 4 Florida Phosphate Mining Initiative Strategy. Report generally concurs with technical merit of Region 4 Phosphate Strategy, but suggests an alternate strategy be investigated that eliminates the aerial survey approach and focuses on ground-based surveys using Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) assessment techniques. Recommended consultation with, David Green, US Air Force (USAF), regarding unit cost data for ground-based radiological survey of Sacramento Air Force Base, California.

August 27, 2003

Region 4 staff contacted David Green, USAF, who indicated that the ground-based survey, which included 100 percent drive-over, along with the collection of 150 soil samples, would cost approximately \$2,200/acre, which is significantly higher than the \$1.15/acre estimate for the aerial radiological survey.

September 2003

EPA Region 4 staff completed the *Draft, Florida Phosphate Initiative, Summary of Information, South Site Management Branch, Waste Management Division, USEPA, Region 4*. The document is a compilation of relevant information developed to date on the Florida Phosphate Mining Initiative.

September 4, 2003

EPA Region 4 staff prepared the *Draft Florida Phosphate Mining Strategy Synopsis* for the Waste Management Division Director. The Waste Management Division Director was briefed on the results of independent review of Florida Phosphate Mining Initiative Strategy by radiation experts from ERT and the former Director, EPA Radiation Laboratory, Montgomery, AL. The Waste Management Division Director advises that the strategy should be revised, merging results from ERT and Radiation Lab report with current strategy.

September 2003

EPA Region 4 staff held multiple meetings and conference calls with ERT, former Laboratory EPA Radiation Lab Director, and DOE Bechtel Nevada to discuss potential options for pursuing ground-based assessments of radiation levels in formerly mined phosphate lands.

October 3, 2003

EPA Region 4 staff developed a *Memorandum from Florida Phosphate Initiative Project Manager to Superfund Remedial and Technical Service Branch Chief* regarding recommendations for a Pilot Aerial Gamma Radiation Study, Phosphate Mining Sites, Central Florida. Follow-up discussion of memorandum with Branch Chief indicated that discussions between Waste Management Division Director and the Director of the EPA Office of Superfund Remediation Technology and Innovation (OSRTI) concluded that the scope of the survey needed to be reduced and that a pilot study involving only residential areas would be conducted initially.

January 13, 2004

EPA Region 4 staff developed the *Draft Pilot Study Summary for Aerial Gamma Radiation Survey* based on January 13, 2004, memorandum.

January - February 2004

EPA Region 4 staff processed an Interagency Agreement and funding for DOE, National Nuclear Security Administration, Remote Sensing Lab to provide technical support for the aerial radiological survey of the formerly mined phosphate land in west-central Florida.

February 5, 2004

EPA Region 4 staff held a scoping meeting with Bechtel Nevada and Argonne National Laboratories to outline scope of activities based on January 13, 2004, Statement of Work.

February 9, 2004

EPA Region 4 staff briefed the Regional Administrator (RA) on the proposed Aerial Radiation Survey over formerly mined phosphate lands in central Florida. Waste Management Director

recommended that radiological data be collected in residential areas overlying formerly mined land phosphate land in west-central Florida and CERCLIS sites. RA concurred with recommendation. Region 4 staff proceeded with preparations to complete aerial radiological survey before June 2004.

February 23 and 24, 2004

EPA Region 4 staff convened a Communication Strategy Planning meeting to 1) reach consensus on the appropriate degree of community involvement and 2) develop and agree on a strategy to finalize the community involvement plan.

February 26, 2004

EPA Region 4 staff held a regional planning meeting that included EPA representatives from the Waste Management Division Office External Affairs, and Information Management Branch, EPA Community Involvement contractor support, and DOE Aerial Survey contractor support.

March 2004

EPA Region 4 staff receive *Draft Communication Strategy for the Central Florida Pilot Radiation Assessment* prepared by Black & Veatch, EPA community involvement contractor. CI Strategy includes limited initial community outreach due to limited data, initial communication through mass-media, and broad-based community involvement after aerial radiological survey is completed.

March 10, 2004

EPA Region 4 staff briefed Regional Director and staff for Office Congressional Affairs regarding proposed aerial radiation survey over formerly mined phosphate lands in central Florida; no significant comments provided during briefing.

March 11, 2004

EPA Region 4 advised by Congressional Affairs Office Director to develop a list of anticipated questions and answers and ensure that the EPA Region 4 Administrator and Deputy Administrator are briefed.

March 23 and 24, 2004

EPA Region 4 staff completed a logistical planning meeting and site reconnaissance with EPA and Bechtel-Nevada Remote Sensing Laboratory.

April 2004

EPA Region 4 received a *Draft Revised Communication Strategy for the Central Florida Pilot Radiation Assessment* prepared by Black & Veatch, EPA community involvement (CI) contractor. CI strategy includes broad based approach based on comments from HQ Office of Radiation Communication and Regional Office of External Affairs.

April 1, 2004

EPA Region 4 staff briefed the Director of Office of Radiation Communication and ORIA on

proposed aerial radiation survey over formerly mined phosphate lands in central Florida. Office of Radiation Communication Director strongly recommended broad, pro-active approach to provide community with as much information in advance of the aerial survey as possible. Also advised developing close working relationship with media.

April 8, 2004

EPA Region 4 staff completed and issued the final work plan for the initial (pilot) aerial radiation survey, which covered the residential areas and the Tenoroc mine site (*Pilot Study Aerial Radiological Survey, Polk and Hillsborough Counties, Final Work Plan*)

April 15, 2004

EPA Region 4 staff briefed FDEP, Waste Management Division Director, and FDOH, Director of Environmental Health Division on proposed aerial radiation survey over formerly mined phosphate lands in central Florida. State recommended delaying extensive community involvement until additional information is collected. Also recommended conducting assessment of both CERCLIS and residential areas. State DOH Director advised that Polk County monitoring program data shows that radiation levels in residential areas have been evaluated and are not of concern.

April 16, 2004

EPA Region 4 staff met with local real estate agent to review potential office space for EPA technical and community involvement staff during aerial survey flight operations.

April 19 and 20, 2004

EPA Region 4 staff reviewed and copied a collection of files identified by FDOH at the April 15, 2004, meeting. The files included historical data collected by the Polk County Health Department during the 1970s, 1980s and 1990s.

April 27, 2004

Region 4 staff met with CI contractor to discuss scope of changes for CI strategy. Based on comments from HQ Office of Radiation Communication and Regional Director of External Affairs, CI strategy is to be expanded to provide for greater initial involvement of the affected community.

May 3, 2004

EPA Region 4 staff briefed the Waste Management Division Director on plans to revise the CI Plan to address concerns of HQ Office of Radiation Communication and Regional Director of External Affairs. Due to negative comments from Regional Chief of Staff, Division Director advised that the survey work needs to be postponed until a "Division Approved" CI strategy can be developed and presented to the RA and Office of External Affairs for approval.

May 12-13, 2004

EPA Region 4 staff held a meeting that covered website development/planning and historical

data review. Meeting attendees included representatives from EPA, EPA CI contractor support, the web design contractor, and the technical support contractor.

May 13, 2004

EPA Region 4 held a follow-up meeting/briefing with the Region's Director of the Office External Affairs on proposed aerial radiation survey over formerly mined phosphate lands in central Florida.

May 13, 2004

Region 4 South Site Management Branch Chief consulted with the press office of Acting Administrator for OSWER on Draft CI Strategy.

May 19, 2004

EPA Region 4 staff briefed the Acting Deputy Waste Management Division Director on proposed aerial radiation survey over formerly mined phosphate lands in central Florida.

May 19, 2004

EPA Region 4 staff briefed Regional State Liaison and Environmental Justice representatives from the Office of the Regional Administrator on proposed aerial radiation survey over formerly mined phosphate lands in central Florida.

June 2004

EPA Region 4 staff received the *Draft Summary of Historical Florida Department of Health, Radiological Survey Data for Polk County, Florida* prepared by DOE Argonne National Laboratory and Remote Sensing Laboratory. Report summarizes radiological data collected by Polk County Health Department from late-1970s through 1990s.

June 1, 2004

EPA Region 4 staff received the *Draft Revised Communication Strategy for the Central Florida Pilot Radiation Assessment* prepared by Black & Veatch, EPA CI contractor. CI strategy revised based on comments from the State to make it more focused and less interactive with the community until more specific information is collected.

June 3, 2004

EPA Region 4 staff briefed Waste Management Division Director on revised CI strategy, State historical data, and comments from April 15, 2004, meeting with State officials.

June 28, 2004

EPA Region 4 staff met with EPA, CI contractor, and website development contractor to review draft outline for website.

July 9, 2004

Draft website became available on-site through secure website link with website contractor,

Argonne National Laboratory.

July 19, 2004

EPA Region 4 staff forwarded the following questions from RA through Division Director to remedial project manager (RPM) regarding the planned radiological survey: 1) Is the aerial survey necessary and why? 2) What level at HQ have the briefings progressed? 3) Have issues regarding health effects and criteria been resolved?

July 22, 2004

EPA Region 4 staff briefed FDEP Director, Waste Management Division and FDOH Environmental Health Division Director on EPA's review of radiological data collected by Polk County Health Department monitoring program from the mid-1970s through the late 1990s.

July 26, 2004

Superfund Program advised of nation-wide Resource Conservation and Recovery Act (RCRA) initiative to conduct inspections at all mineral mining sites. Florida sites will focus on phosphate mining and formerly excluded process operations that should be regulated. Relevant copies of Superfund Florida Phosphate Mining Initiative documents requested by Acting Director, RCRA Enforcement.

September 7 and 8, 2004

EPA Region 4 staff held a follow-up meeting with Argonne National Laboratory to review draft of Florida Phosphate Mining Initiative website, which is intended to be a primary tool in providing information to the public.

September 16, 2004

EPA Region 4 staff briefed OSWER and ORIA staff on status of Florida Phosphate Mining Initiative, including survey plans, CI plans, draft website, historical State data, State comments/recommendations, and recommended next steps.

September 29, 2004

EPA Region 4 staff met with Waste Management Division Director regarding OSRTI Director's concerns about visibility and physiological impacts that a low-level aerial survey may have on the community. Aerial radiological survey delayed pending OSRTI's consultation with ERT and review and comparison of the aerial-based radiological mapping approach with other ground-based approaches.

October 4, 2004

Regional meeting held between Regional Division Director and OSRTI Director.

October 19-21, 2004

EPA Region 4 staff held a Technical Project Planning meeting with ACOE, Argonne National Lab, and EPA to discuss scope and strategy for the planning of the ground-based phase of the Florida Phosphate Mining Initiative. Planning for Phase 2 was initiated in response to questions from State, as well as EPA Regional and HQ managers who requested information about the details of the project once the aerial survey was completed.

October 20, 2004

OSRTI Director requested Assistant Administrator, Agency for Toxic Substances and Disease Registry (ATSDR) for consultation regarding appropriateness of radiological screening criteria proposed for survey.

November 2, 2004

EPA Region 4 staff updated ATSDR on scope of radiological assessment plans, discussed future role of ATSDR during assessment, identified/discussed expectations at upcoming State meeting.

November 22, 2004

FDOH Division Director met with OSRTI Director regarding State of Florida concerns.

November 29, 2004

EPA Region 4 staff met with FDEP Waste Management Division Director and FDOH Environmental Health Division Director in an effort to resolve scope of survey work and criteria. The meeting was planned by the State to allow FDOH and FDEP to explain (1) why the State felt EPA should not survey residential areas and (2) why survey criteria should be based on a public health level, not long-term risk levels. EPA provided justification as to why the residential areas should be included and why assessment and cleanup criteria should be protective of long-term cancer risks. Post-meeting consultation with Waste Management Director confirmed that EPA would have to utilize the Agency's criteria and that EPA would need to proceed with aerial radiological survey of CERCLIS sites and residential areas.

December 6, 2004

EPA Region 4 staff held a Technical Project Planning meeting for Phase 2 with ACOE, Argonne National Lab, EPA and CI support staff. During the meeting, an outline was developed for Phase 2 that included ground-based radiological survey of areas identified from aerial survey.

January 6, 2005

Spring 2005 aerial radiological survey schedule provided by Bechtel Nevada, DOE RSL. Key milestones included March 1- Mobilization; April 4 - Funding to Bechtel Nevada; April 20 - Aerial Survey Start; May 31 - Aerial Survey Complete.

January 19, 2005

EPA Region 4 staff received *Draft, Florida Phosphate Areas, Radiological Assessment and Remedial Action Project Management Strategy Outline* prepared by ACOE and DOE Argonne National Lab. IAG planning and SOW development started to provide funding to ACOE to prepare Phase 2 work plan in an effort to be prepared to proceed with Phase 2 of the assessment shortly after the completion of the Phase 1 aerial radiological survey.

January 20, 2005

EPA Region 4 staff met with ACOE and Argonne National Laboratory to discuss additional details and elements of Draft Phase 2 Project Management Strategy.

January 28, 2005

A teleconference held with EPA, ATSDR, FDEP and FDOH to discuss scope of overall project and CI issues. FDEP Deputy Secretary and FDOH Environmental Health Division Director wanted to continue discussions about limiting scope of work and not surveying residential areas. State was very concerned about the socio-economic impacts a radiological survey could have on the area.

February 15, 2005

FDOH submitted proposed strategy for assessing and responding to radiation risks to residential areas in west-central Florida. Plan recommends a tiered approach, including 1) no action for radiation levels below 100 mRem/yr; 2) education and recommendations that the homeowner can undertake when radiation levels are between 100 to 500 mRem/yr; 3) response actions by EPA if radiation levels exceed 500 mRem/yr.

February 23 and 24, 2005

At the direction of the Waste Management Division Director, a meeting was held with EPA Regional Management and Staff, HQ ORIA and OSRTI Staff, Argonne National Laboratory, CI contractor, and EPA radiation consultant to discuss the possibility of implementing approaches that would focus efforts and funds in areas that potentially posed the greatest risk. Progress was made and summarized by the ACOE in minutes from the meeting and conceptual approach flow-chart.

February 16, 2005

New (expanded scope) draft aerial survey work plan submitted for EPA review. The work plan incorporated additional scope recommended by the State of Florida, which included coverage of all CERCLIS sites. In addition, a data evaluation and prioritization method was described for using the aerial survey to focus subsequent ground-based survey efforts.

February 28, 2005

EPA Region 4 staff met with FDEP Chief of Staff and FDOH CI and Public Relations management to brief State CI specialists on the project and get feedback on the Draft CI Strategy. During the meeting, focus shifted toward a discussion regarding whether EPA should include residential areas in the aerial radiation survey.

March 2, 2005

EPA Region 4 staff briefed the Acting Deputy Administrator for OSWER. Region 4 staff were asked to brief the OSWER Acting Deputy Administrator on upcoming plans for an aerial radiation survey. Based on State concerns, the scope of the planned survey was limited to residential areas. The Acting Deputy Administrator expressed concern regarding the project's high costs and the socio-economic impacts the project may have on the State. The Acting Deputy Administrator asked that 1) the RA brief the Governor's office; 2) the Acting Deputy Administrator be provided with a briefing paper to brief the Acting Administrator; and 3) the RA talk with him again about the project.

March 5, 2005

EPA Region 4 staff prepared briefing paper for the OSWER Acting Deputy Administrator to brief Acting Administrator.

March 23, 2005

Follow-up meeting to the March 2, 2005, OSWER Director briefing held. Follow-up meeting participants included Region 4 Regional Administrator, Acting Deputy Administrator for OSWER, Associate Administrator for Indoor Air and Radiation, EPA General Counsel, and staff from the Administrator's office.

April 27, 2005

EPA Region 4 staff met with Argonne and National Council of Radiation Protection Board member to discuss FDOH's recommendations concerning the appropriate criteria to assess/address health risks from TENORM exposures. Also reviewed National Council on Radiation Protection (NCRP) and other government agency and State approaches to public health protection from TENORM exposure.

May 16, 2005

EPA Region 4 staff prepared a radiological assessment/cleanup criteria paper and presented it to EPA Deputy Waste Management Division Director. Paper intended to explain why State's approach to addressing risks from TENORM is out-of-sync with EPA and other Federal agencies, national scientific organizations, and other states.

June 2005

EPA Region 4 staff presented a draft exit strategy to EPA Deputy Waste Management Division Director in an effort to address the apparent impasse between EPA and the State of Florida regarding TENORM issues associated with phosphate mining. Exit strategy outlines an approach to refer the CERCLIS sites to the State and code the status of the sites in CERCLIS as "other cleanup authority" (OCA).

June 20, 2005

EPA Region 4 staff briefed the Secretary, FDEP and Director, FDOH on EPA's Florida Phosphate Mining Initiative. EPA provided a PowerPoint overview on general background issues, potential threats, mine owners/operators, generally accepted radiation assessment/response criteria, and potential approaches to address risks to human health.

July 19, 2005

EPA Region 4 staff briefly introduced the EPA Administrator to the Florida Phosphate Mining Initiative during the Administrator's visit to Region 4. During his visit, the Administrator was briefing on various Regional issues; the main Waste Management Division issue was the Florida Phosphate Mining Initiative.

August 5, 2005

EPA Administrator and Region 4 Administrator met with the Governor of Florida regarding the Florida Phosphate Mining Initiative.